

**OSBORN LAW, p.c.**

**43 West 43<sup>rd</sup> Street, Suite 131  
New York, New York 10036**

DANIEL A. OSBORN  
LINDSAY M. TRUST


TELEPHONE  
212 - 725 - 9800

FACSIMILE  
212 - 500 - 5115

December 30, 2019

**VIA ECF**

Honorable John G. Koeltl  
United States District Judge  
U.S. District Court  
500 Pearl Street  
New York, New York 10007-1312

**APPLICATION GRANTED  
SO ORDERED**   
**VERNON S. BRODERICK PART I**  
**U.S.D.J. 12/30/2019**

Re: *Thomas v. Commissioner of Social Security*,  
Civil Action No. 19-CV-06990-JGK

Dear Judge Koeltl,

We write on behalf of plaintiff, Wade Thomas, with the consent of the defendant, to respectfully request a 60-day extension of time to file plaintiff's motion for judgment on the pleadings. Plaintiff's motion is currently due on **December 30, 2019**. Plaintiff respectfully requests an extension of time up to and including, **February 28, 2020**. This is plaintiff's first request for an extension of time.

Subject to the approval of the Court, the parties have agreed to the following amended briefing schedule:

- a. Plaintiff to file his motion for judgment on the pleadings on or before **February 28, 2020**;
- b. Defendant to serve its response/cross-motion on or before **April 28, 2020**; and
- c. Plaintiff to serve his reply, if any, on or before **May 19, 2020**.

Thank you for your consideration of this request.

Honorable John G. Koeltl  
December 30, 2020  
Page 2

Respectfully submitted,

s/Daniel A. Osborn  
Daniel A. Osborn  
OSBORN LAW, P.C.  
43 West 43<sup>rd</sup> Street, Suite 131  
New York, New York 10036  
Telephone: 212-725-9800  
Facsimile: 212-500-5115  
dosborn@osbornlawpc.com